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November 16, 2010

Mike O'Herron
Montana DNRC
2705 Spurgin Road
Missoula, MT 59804
Sent via e-mail dnrchcp@mt.gov

Dear Mr. O'Herron,

Thank you for the opportunity to comment on DNRC's final environmental impact statement (EIS) and Habitat Conservation Plan (HCP). MEIC submitted comments on the draft EIS/HCP in October of 2009. We are concerned that DNRC has only made minimal changes to the draft plan and that this final plan will fail to protect endangered species and their habitats. Particularly, we are concerned about the impacts of proposed management activities on threatened grizzly bears, Canada lynx, and bull trout.

The purpose of the HCP is to balance forest management activities on with species and habitat conservation on State trust lands. Instead, the final HCP favors revenue generation and timber harvesting over protecting endangered species. We believe that three critical changes need to be made to the final plan, to better ensure species protection. These are 1) shorten the plan's 50-year timeframe 2) consider a serious conservation alternative 3) include all trust lands critical for each species in the planning area. For more detailed changes, we would like to incorporate by reference comments and suggestions submitted by experts at the U.S. Environmental Protection Agency, Montana Fish, Wildlife, and Parks, Defenders of Wildlife, and Natural Resources Defense Council, Friends of the Wild Swan, Audubon Society, Swan View Coalition, and Earthjustice. We also incorporate by reference our comments on the draft EIS/HCP because many of them are still relevant.

The 50-year lifetime for the HCP is problematic for two reasons. First, it is difficult to develop a plan that adequately predicts whether management activities will have negative impacts on species and their habitats 50 years from now. There are substantial uncertainties associated with DNRC's proposed management activities, especially near aquatic and riparian areas. Second, the impact of management activities is even more difficult to predict with the tremendous uncertainties posed by

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climate change. Current landscape-level changes are likely to become even more dramatic over the next few decades. DNRC should develop a plan with a reasonable timeframe that can be extended or modified based on specific monitoring results.

It is also critical for DNRC to include a true conservation alternative in their analysis. The range of alternatives that DNRC analyzed in their final plan did not include a commitment to reducing logging, road miles, road densities or grazing in the HCP project area. Federal law requires that state agencies consider and rigorously evaluate a “reasonable range of alternatives.” These alternatives must be objective and alternatives that are considered but eliminated must include a brief explanation why they were eliminated. DNRC must consider a true conservation alternative that minimizes timber harvesting and prioritizes habitat conservation and species resilience before moving forward.

Finally, it is critical that DNRC includes all state parcels that are important to HCP species in their project area. Many acres of lands slated for transfer or development are purposefully excluded from the HCP. Land development is one of the key indicators of wildlife species survival. Therefore, it is crucial for DNRC to consider the cumulative effects that development activities on adjacent lands may have on wildlife populations and their habitat.

Thank you for thoughtful consideration of our comments on the final Habitat Conservation Plan. If you have questions or need further clarification of our comments please feel free to contact me.

Sincerely,

Kyla Wiens, Program Associate